



Shapiro Arato Bach LLP

1140 Avenue of the Americas, 17th Floor, New York, NY 10036
phone: 212-257-4880
www.shapiroarato.com

Alexandra A.E. Shapiro
ashapiro@shapiroarato.com
Direct: 212-257-4881

November 25, 2024

VIA ECF

Hon. Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

We respectfully submit this letter on behalf of Defendant Sean Combs in response to the government's letter submitted today (Dkt. 86). The government's 13-page letter re-hashes old arguments, adds new arguments, and seeks to supplement the factual record even though the parties have already provided full briefing, and the Court held a lengthy bail hearing on Friday, November 22, 2024. The Court asked the parties for "short letters" on a very specific legal issue. Mr. Combs' letter responded to the Court's request and addressed only that issue.

Mr. Combs objects to the government's submission to the extent it goes beyond responding to the Court's specific question, and requests that the Court not consider any new or repetitive information in the government's letter.

Respectfully Submitted,

/s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro
Shapiro Arato Bach LLP
1140 Avenue of the Americas, 17th Fl.
New York, NY 10036
(212) 257-4880
ashapiro@shapiroarato.com

Marc Agnifilo
Teny Geragos
AGNIFILO INTRATER
445 Park Ave., 7th Fl.
New York, NY 10022

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646-205-4350
marc@agilawgroup.com
teny@agilawgroup.com

Anthony Ricco
Law Office of Anthony L. Ricco
20 Vesey Street
New York, NY 10007
(212) 791-3919
tonyricco@aol.com

Anna Estevao
SHER TREMONTE LLP
90 Broad St., 23rd Fl.
New York, NY 10004
(212) 202-2600
aestevao@shertremonte.com

cc: all counsel by ECF